

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

Filed 8/6/14

Clerk, U. S. District Court
Western District of Texas

By [Signature]
Deputy

THE ESTATE OF DAMION MICHAEL
SCHROEDER, by and through the personal
representative Michael Schroeder and Sandra L.
Keyser; and ANNE M. CLANCEY, as guardian of
L.G.C., Heir of Damion Michael Schroeder,
Plaintiffs,

-vs-

Case No. A-12-CA-1139-SS

GILLESPIE COUNTY; GILLESPIE COUNTY
SHERIFF'S DEPARTMENT; SHERIFF BUDDY
MILLS; and UNNAMED DEPUTY SHERIFFS,
Defendants.

VERDICT FORM

We, the jury, unanimously answer the following questions by a preponderance of the evidence:

QUESTION ONE

Do you find, from a preponderance of the evidence, Gillespie County violated Damion Michael Schroeder's constitutional rights to reasonable medical care and protection from harm while he was a pretrial detainee at Gillespie County Jail?

Answer "yes" or "no".

no

If you answered "yes," proceed to Question Two. If you answered "no," answer no further questions.

QUESTION TWO

Do you find, from a preponderance of the evidence, that Gillespie County's 2009 Inmate Suicide Prevention & Watch Policy was the moving force in the death of Damion Michael Schroeder?

Answer "yes" or "no":

If you answered "yes," proceed to Question Three. If you answered "no," answer no further questions.

QUESTION THREE

What damages, if any, proved by a preponderance of the evidence, did each of the plaintiffs sustain as a result of Gillespie County's violation of Damion Michael Schroeder's constitutional rights?

(a) Damion Michael Schroeder's Estate

Answer in dollars and cents, if any:

_____ reasonable and necessary expenses of hospitalization, medical and nursing care, and treatment

_____ reasonable funeral and burial expenses

(b) Michael Schroeder

Answer in dollars and cents, if any:

_____ loss of companionship and society sustained in the past

_____ loss of companionship and society which in all probability will be sustained in the future

_____ mental pain and suffering in the past

_____ mental pain and suffering which in all probability will be sustained in the future

(c) Lola Grace Clancey

Answer in dollars and cents, if any:

_____ pecuniary loss sustained in the past

_____ pecuniary loss which in all probability will be sustained in the future

_____ loss of companionship and society which in all probability will be sustained in the future

There are no further questions. Sign and date this form and inform the CSO you have reached a verdict.

Submitted the 6 day of August 2014 at 3:00 o'clock m.

**SIGNATURE REDACTED PURSUANT
TO E-GOVERNMENT ACT OF 2002**

PRESIDING JUROR